

# EXHIBIT "A"

**From:** [Weston Ray](#)  
**To:** [Robert MacNaughton](#)  
**Subject:** FW: 4:22-cv-003730  
**Date:** Tuesday, February 6, 2024 12:42:22 PM

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**From:** Weston Ray  
**Sent:** Monday, February 5, 2024 6:11 PM  
**To:** Guillermo Alarcon <[GAlarcon@abaustin.com](mailto:GAlarcon@abaustin.com)>  
**Cc:** Matthew Baumgartner <[MBaumgartner@abaustin.com](mailto:MBaumgartner@abaustin.com)>  
**Subject:** RE: 4:22-cv-003730

Guillermo, there were only 56 that were not duplicates of prior productions.

Best regards,

**Weston Ray**

Attorney



d 713.533.1933 | c 512.563.8114

[2221 S. Voss | Houston, TX 77057](#)



[PorterFirm.com](https://www.PorterFirm.com)

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**From:** Guillermo Alarcon <[GAlarcon@abaustin.com](mailto:GAlarcon@abaustin.com)>  
**Sent:** Sunday, February 4, 2024 3:32 PM  
**To:** Weston Ray <[weston@porterfirm.com](mailto:weston@porterfirm.com)>  
**Cc:** Matthew Baumgartner <[MBaumgartner@abaustin.com](mailto:MBaumgartner@abaustin.com)>  
**Subject:** RE: 4:22-cv-003730

Weston—This can't be everything. This production contains only 56 emails. The *earliest* email in this set is from October 19, 2022. We know for a fact that Espinosa was very involved in the project generally, and in the power pole removal specifically, for months before October 2022.

Guillermo

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**From:** Weston Ray <[weston@porterfirm.com](mailto:weston@porterfirm.com)>  
**Sent:** Thursday, February 1, 2024 2:59 PM  
**To:** Guillermo Alarcon <[GAlarcon@abaustin.com](mailto:GAlarcon@abaustin.com)>  
**Subject:** RE: 4:22-cv-003730

# EXHIBIT "A"

Good afternoon Guillermo,

Following the deposition, we discussed the production of emails from Oxberry employee Barry Espinosa. While we don't agree these emails would be subject to the discovery requests served on Grant Meadows, we have voluntarily reviewed his records for any documents related to this lawsuit, including emails that did not include Mr. Jamea. I have attached these documents for your review.

If you have any trouble accessing the files, please let me know.

[PROD004-65ba6f868f082b6387986caa.zip](#)

Best regards,

**Weston Ray**

Attorney



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